

Kathryn Ross

Date:
2018.09.28
09:50:20 -04'00'

September 27, 2018

Direct: (213) 452-6550

VIA U.S. MAIL AND E-MAIL

Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination and Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20436
Email: CELA@fec.gov

Re: **FEC MUR 7448**

Dear Mr. Jordan:

We are writing as counsel to Citizens for Waters and its Treasurer, David L. Gould, in response to the complaint filed by the National Legal and Policy Center on or about August 1, 2018 ("the "Complaint"), in MUR 7448.

Introduction

The Complaint was filed against Citizens for Waters and Mr. Gould; the California Democratic Party ("CDP") and its Treasurer, Katherine Moret; and Kamala Harris for Senate and its Treasurer, Stephen J. Kaufman, alleging violations of the contribution limits set forth in Sections 431(8)(A)(i), 432(e)(3) and 441a(a)(2)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 CFR 100.52.¹ The Complaint alleges that a \$35,000 payment made by the CDP to Citizens for Waters for a slate mailer featuring Kamala Harris was an illegal "coordinated" contribution exceeding the Party's \$5,000 contribution limit to Kamala Harris for Senate. The Complaint is unclear about the violations involving Citizens for Waters.

However, the Complaint completely overlooks and fails to acknowledge the existence of the CDP's separate "coordinated party expenditure" limit, which allowed the CDP to make the payment to Citizens for Waters on behalf of Kamala Harris for Senate in connection with the November 8, 2016 General Election. (See 52 U.S.C. 30116(d) and 11 C.F.R. 109.30, 109.32-109.34.) The payment was within the CDP's coordinated expenditure limit for the U.S. Senate race during the 2016 General Election, and was timely and properly disclosed by Citizens for Waters and the CDP on their campaign reports. Therefore, the Complaint does not provide any basis for asserting a violation of the Act or Commission regulations, and the Commission should immediately dismiss the complaint as to all respondents.

¹ The Complaint refers to the prior statutory provisions. These sections have been renumbered as 52 U.S.C. §§ 30101(8)(A)(i), 30102(e)(3) and 30116(a)(2)(A).

Moreover, the Complaint does not provide any basis for the FEC to conduct an audit of Citizens for Waters, and complainant's request to the Commission for such an audit should be soundly rejected.

Analysis

Citizens for Waters (FEC ID#C00167585) is the principal campaign committee of Congresswoman Maxine Waters, and David L. Gould serves as the committee's Treasurer. In accordance with California law, Citizens for Waters produces and distributes a "slate mailer" known as the *Congresswoman Maxine Waters Sample Ballot and Voter Recommendations*, featuring federal and non-federal candidates appearing on the ballot. Pursuant to the FEC in Advisory Opinion 2004-37 (Waters), a payment made by a federal candidate to Citizens for Waters for the proportionate costs of his or her appearance in the slate mailer is not considered a contribution to Citizens for Waters.

The CDP (FEC ID#C00105668) is the federally registered state party committee of the Democratic Party in California. A state party committee may contribute up to \$5,000 per election to a U.S. Senate candidate. Separate and in addition to this contribution limit, a state party committee may make "coordinated party expenditures" in connection with the general election of a federal candidate. (52 U.S.C. 30116(d); 11 C.F.R. 109.30, 109.32-109.34.) A state party committee may pay for goods or services (including communications) on behalf of a federal candidate, up to the applicable "coordinated party expenditure" limit.

The Commission has provided guidance explaining the difference between the party's use of its contribution limit and its coordinated party spending authority, as follows: "In making a coordinated party expenditure, the party committee pays for goods or services in coordination with a candidate but does not give the money directly to the candidate or candidate committee. *For example, the payment of a campaign bill could be treated and reported as a coordinated party expenditure . . .*"² Accordingly, the Act, FEC regulations and Commission guidance are all clear that a state party can use its coordinated spending authority outside of its \$5,000 per election contribution limit, to pay a bill on behalf of a general election candidate for U.S. Senate in the state.

The coordinated party expenditure limit for a Senate candidate is calculated as follows: state voting age population x 2 cents, increased by the COLA; or \$20,000 increased by the COLA, whichever is greater. (52 U.S.C. 30116(d); 11 C.F.R. 109.32.) Based on the statutory formula, the CDP's "coordinated party expenditure" limit during the 2016 election cycle applicable to a candidate for United States Senate was \$2,886,500. (https://transition.fec.gov/info/charts_cpe_2016.shtml.)

In 2016, Kamala Harris was the endorsed candidate of the CDP and the Democratic nominee for the office of United States Senator in the November 8, 2016 General Election.³ Kamala Harris

² Federal Election Commission, Campaign Guide for Political Party Committees at 48 (Aug. 2013), available at <https://www.fec.gov/resources/cms-content/documents/partygui.pdf> (emphasis added).

³ Because of California's "Top Two" primary system, Senator Harris was actually one of two Democrats competing in the November 8, 2016 General Election.

prevailed in the general election and is now a current United States Senator from California. Kamala Harris for Senate (FEC ID# C00571919) is Senator Harris' principal campaign committee.

For the November 6, 2018 general election, Citizens for Waters requested payment from Kamala Harris for Senate in the amount of \$35,000, for the proportionate cost of the slate mailer attributable to Kamala Harris. Citizens for Waters received a \$35,000 payment from the CDP on October 17, 2016 for Sen. Harris' appearance in the general election slate mailer. The CDP disclosed that payment as a "Coordinated Party Expenditure" on Schedule F for Line 25 of the CDP's 12 Day Pre-General Report for the period 10/1/16-10/19/16. The report indicated that the payment was made on behalf of Kamala Harris, and described the payment as "Fair share of slate mailer." (A true and correct copy of the cover page and relevant page from the CDP's 12 Day Pre-General Report is attached hereto as Exhibit "A.")⁴

As is evident from the Complaint, Citizens for Waters disclosed the \$35,000 payment received from the CDP as a slate mailer payment on Schedule A for Line 15 (offset to operating expenditures) on its 12 Day Pre-General Report, and on its Slate Mailer Organization Campaign Statement (Form 401) filed under California law. (See relevant pages of Citizens for Waters reports, submitted with the Complaint and reattached here for convenience collectively as Exhibit "B.")⁵

The Complaint alleges that the payment made by the CDP to Citizens for Waters for the appearance of Kamala Harris on the slate mailer was an excess contribution that did not qualify as an "exempt party activity." (see 11 CFR §§100.80, 100.140.) The slate mailer produced and distributed by Citizens for Waters is not an "exempt party activity," nor does FEC Advisory Opinion 2004-37, which authorizes this activity, make any suggestion that it should be – as the Complaint implies. However, as is evident from this response and the supporting materials – including the Complaint itself – the \$35,000 payment made by the CDP to Citizens for Waters was a proper "coordinated party expenditure" under 52 U.S.C. § 30116(d), and was properly and timely disclosed by the CDP and Citizens for Waters. Therefore, the Complaint is baseless.

Conclusion

For the reasons described herein, the Complaint does not contain any factual or legal basis for asserting a possible violation of the Act by respondents. The CDP made a proper payment for the general election on behalf of Kamala Harris within its "coordinated party expenditure" limit, and the payment was properly disclosed by Citizens for Waters as an offset to operating expenditures on its 12 Day Pre-General Report. In filing this Complaint, the National Legal and Policy Center has either completely misconstrued the law or purposefully chosen to ignore the key statute and regulations providing the basis for this payment.

⁴ The CDP originally described the expenditure as a "slate mailer" payment and then amended its 12 Day Pre-General Report to add the "Fair Share" language.

⁵ Citizens for Waters reported the payment on its 12 Day Pre-General Report as received from the Democratic State Central Committee of California FFA, the name on the bank account used by the CDP for its federal program.

Jeff S. Jordan
September 27, 2018
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Therefore, we respectfully request that the Commission find no reason to believe a violation has occurred, and dismiss this Complaint in its entirety with no further action against respondents.

Very truly yours,



Stephen J. Kaufman

Enclosures

1000444401

10004442001

EXHIBIT "A"

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5
California Democratic Party

ADDRESS (number and street) 1830 9th Street
 Check if different than previously reported. (ACC) Sacramento CA 95811

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲
C C00105668 3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)
(a) Quarterly Reports:
 April 15 Quarterly Report (Q1)
 July 15 Quarterly Report (Q2)
 October 15 Quarterly Report (Q3)
 January 31 Year-End Report (YE)
 July 31 Mid-Year Report (Non-election Year Only) (MY)
 Termination Report (TER)
(b) Monthly Report Due On:
 Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11) (Non-Election Year Only)
 Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only)
 Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE)
(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
 Convention (12C) Special (12S)
Election on / / In the State of
(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)
Election on / / In the State of

5. Covering Period 10 / 01 / 2016 through 10 / 19 / 2016

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
Type or Print Name of Treasurer Moret, Katherine, . .

Signature of Treasurer Moret, Katherine, . . [Electronically Filed] Date 02 / 14 / 2017

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full)
California Democratic Party

Has your committee been designated to make coordinated expenditures by a political party committee?
 YES NO
 If YES, name the designating committee:
California Democratic Party

Full Name of Subordinate Committee
 Mailing Address
 City State ZIP Code

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Bertolina & Barnato Consulting

Purpose of Expenditure
 Finance Consulting 001
 Category/Type

Mailing Address 1005 12th Street Suite H
 Date 10 / 13 / 2016

City Sacramento State CA Zip Code 95814-3940

Name of Federal Candidate Supported Harris, Kamala, .. Office Sought: House Senate Presidential State: CA District: _____

Amount 850.00

Aggregate General Election Expenditure for this Candidate ▶ 784399.27
 Transaction ID : EDTFALC7293

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Caple, Elena, . .

Purpose of Expenditure
 salary 001
 Category/Type

Mailing Address 5600 Wilshire Blvd,#434
 Date 10 / 14 / 2016

City Los Angeles State CA Zip Code 90036

Name of Federal Candidate Supported Harris, Kamala, .. Office Sought: House Senate Presidential State: CA District: _____

Amount 2029.16

Aggregate General Election Expenditure for this Candidate ▶ 784399.27
 Transaction ID : EDTFALC7294

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Citizens For Waters

Purpose of Expenditure
 Payment for Fair share of state mailer (K.Harris,USSen) 001
 Category/Type

Mailing Address 3700 Wilshire Blvd. Suite 1050B
 Date 10 / 13 / 2016

City Los Angeles State CA Zip Code 90010-3015

Name of Federal Candidate Supported Harris, Kamala, .. Office Sought: House Senate Presidential State: CA District: _____

Amount 35000.00

Aggregate General Election Expenditure for this Candidate ▶ 784399.27
 Transaction ID : EDTFALC7292

SUBTOTAL of Expenditures This Page (optional).....▶ 37879.16

TOTAL This Period (last page this line number only).....▶

160444747400

Image# 201610279036680472

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

California Democratic Party

ADDRESS (number and street) 1830 9th Street

Check if different than previously reported. (ACC) Sacramento CA 95811

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00105868

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- | | | | |
|--------------------------------------|--------------------------------------|---------------------------------------|--|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8) | <input type="checkbox"/> Nov 20 (M11)
<small>(Non-Election Year Only)</small> |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9) | <input type="checkbox"/> Dec 20 (M12)
<small>(Non-Election Year Only)</small> |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE) |

- (c) 12-Day PRE-Election Report for the:
- | | | |
|---|---|---------------------------------------|
| <input type="checkbox"/> Primary (12P) | <input checked="" type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) | |

Election on / / in the State of

- (d) 30-Day POST-Election Report for the:
- | | | |
|--|---------------------------------------|--|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|--|---------------------------------------|--|

Election on / / in the State of

5. Covering Period 10 / 01 / 2016 through 10 / 19 / 2016

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
Type or Print Name of Treasurer Moret, Katherine, . .

Signature of Treasurer Moret, Katherine, . . [Electronically Filed] Date 10 / 27 / 2016

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full)
California Democratic Party

Has your committee been designated to make coordinated expenditures by a political party committee?
 YES NO
If YES, name the designating committee:
California Democratic Party

Full Name of Subordinate Committee
Mailing Address
City State ZIP Code

NONSTANDARD

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Bertolina & Barnato Consulting

Mailing Address **1005 12th Street Suite H**

City **Sacramento** State **CA** Zip Code **95814-3940**

Name of Federal Candidate Supported **Harris, Kamala, . .** Office Sought: House Senate Presidential State: **CA** District: _____

Aggregate General Election Expenditure for this Candidate ▶ **784399.27**
Transaction ID : **EDTFALC7293**

Purpose of Expenditure
Finance Consulting Memo Item
Category/Type **001**

Date **10 / 13 / 2016**

Amount **850.00**

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Caple, Elena, . .

Mailing Address **5600 Wilshire Blvd,#434**

City **Los Angeles** State **CA** Zip Code **90036**

Name of Federal Candidate Supported **Harris, Kamala, . .** Office Sought: House Senate Presidential State: **CA** District: _____

Aggregate General Election Expenditure for this Candidate ▶ **784399.27**
Transaction ID : **EDTFALC7294**

Purpose of Expenditure
salary Memo Item
Category/Type **001**

Date **10 / 14 / 2016**

Amount **2029.16**

Full Name (Last, First, Middle Initial) of Each Payee Memo Item
Citizens For Waters

Mailing Address **3700 Wilshire Blvd. Suite 1050B**

City **Los Angeles** State **CA** Zip Code **90010-3015**

Name of Federal Candidate Supported **Harris, Kamala, . .** Office Sought: House Senate Presidential State: **CA** District: _____

Aggregate General Election Expenditure for this Candidate ▶ **784399.27**
Transaction ID : **EDTFALC7292**

Purpose of Expenditure
slate mailer (K.Harris,USSen) Memo Item
Category/Type **001**

Date **10 / 13 / 2016**

Amount **35000.00**

SUBTOTAL of Expenditures This Page (optional).....▶ **37879.16**

TOTAL This Period (last page this line number only).....▶

14-00000-1000000

EXHIBIT "B"

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

CITIZENS FOR WATERS

ADDRESS (number and street)

249 E Ocean Blvd # 685

Check if different than previously reported. (ACC)

Long Beach

CA

90802

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00167585

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

STATE ▼ DISTRICT

CA

43

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

11 / 08 / 2016

in the State of

CA

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the State of

5. Covering Period

10 / 01 / 2016

through

10 / 19 / 2016

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

GOULD, DAVID, ..

Type or Print Name of Treasurer

GOULD, DAVID, ..

Signature of Treasurer

[Electronically Filed]

Date

12 / 08 / 2016

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office Use Only

FEC FORM 3 (Revised 05/2016)

10044744001

09-25-2016 10:15:00

Slate Mailer Organization Campaign Statement

(Government Code Sections 84218-84219)

Type or print in ink.

SEE INSTRUCTIONS ON REVERSE

Date Stamp	COVER PAGE
Statement Covers Period from: <u>09/25/2016</u> through: <u>10/22/2016</u>	CALIFORNIA 1992 FORM 401
	1/6 FOR OFFICIAL USE ONLY

I Slate Mailer Organization Information

FULL NAME OF SLATE MAILER ORGANIZATION:
CITIZENS FOR WATERS

ID NUMBER: 1271833

ADDRESS: _____
NO AND STREET

CITY: _____ STATE: CA ZIP CODE: 90010 PHONE NUMBER: _____

Los Angeles

NAME OF TREASURER:
David Gould

ADDRESS: _____
NO AND STREET

CITY: _____ STATE: CA ZIP CODE: 90010 DAYTIME PHONE NUMBER: _____

Los Angeles

II Is This A General Purpose Committee?

If this Slate Mailer Organization is also a "general purpose committee" as defined in Government Code Section 82027.5, check box and attach the committee's campaign disclosure report to this statement.

Committee Report Attached ID Number if Recipient Committee

III Summary of Payments

	(A) Total This Period Sec. A, Line 3	(B) Cumulative to Date (Since January 1 of calendar year covered) Sec. B, Line 3
1 TOTAL PAYMENTS RECEIVED	\$ <u>155000.00</u>	\$ <u>258000.00</u>
2 TOTAL PAYMENTS MADE	\$ <u>2500.00</u>	\$ <u>96250.00</u>

IV Verification

I have used all reasonable diligence in preparing this statement. I have reviewed the statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 10/25/2016 At _____ City and State _____
DATE CITY AND STATE

By David L. Gould SIGNATURE OF RESPONSIBLE OFFICER

Name of Responsible Officer David L. Gould Title: Treasurer
TYPE OR PRINT

FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT FOR SLATE MAILER ORGANIZATIONS.

16045-110-0001

Schedule A Payments Received

SCHEDULE A

Statement covers period
 from 09/25/2016
 through 10/22/2016

CALIFORNIA
 1992 FORM **401**

2/6

I.D NUMBER
 1271833

SEE INSTRUCTIONS ON REVERSE
 NAME OF SLATE MAILER ORGANIZATION:

(1)		(2)		(3)		(4)		(5)
DATE RECEIVED	IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	NAME, OFFICE SOUGHT, AND JURISDICTION OF CANDIDATE/ MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MAILER		AMOUNT RECEIVED THIS PERIOD	CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE		
			SUPPORT	OPPOSE				
10/13/2016	Kim Nguyen for LA Superior Court Judge 2016 Los Angeles Reference No: CA 90017	Kim Nguyen Superior Court Judge Los Angeles County	X		10000.00	20000.00		
10/15/2016	Californians for Lower Drug Prices. Los Angeles Reference No: CA 90028	Statewide 61	X		20000.00	20000.00		
10/15/2016	For Adult Industry Responsibility Committee Los Angeles Reference No: CA 90028	60	X		20000.00	20000.00		
SUBTOTAL						\$		

Summary

- Amount Received - Payments of \$100 or More (Include all Schedule A subtotals) \$ 155000.00
- Amount Received - Payments of Less than \$100 (Not Itemized) \$ 0.00
- Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1 \$ 155000.00

Schedule A Payments Received

SCHEDULE A

Statement covers period
from 09/25/2016
through 10/22/2016

CALIFORNIA
1992 FORM
401

4/6

SEE INSTRUCTIONS ON REVERSE
NAME OF SLATE MAILER ORGANIZATION:

CITIZENS FOR WATERS

I.D NUMBER
1271833

(1) DATE RECEIVED	(2) IDENTIFICATION OF PERSONS FROM WHOM \$100 OR MORE HAS BEEN RECEIVED THIS PERIOD (SEE IMPORTANT INSTRUCTIONS ON REVERSE)	(3) (a) NAME, OFFICE SOUGHT, AND JURISDICTION OF CANDIDATE/ MEASURE SUPPORTED OR OPPOSED (IF DIFFERENT THAN COLUMN 2)	(b) CHECK BOX TO INDICATE IF PAYMENT WAS RECEIVED TO SUPPORT OR OPPOSE CANDIDATE OR MEASURE INCLUDED IN SLATE MAILER		(4) AMOUNT RECEIVED THIS PERIOD	(5) CUMULATIVE AMOUNT RECEIVED SINCE JANUARY 1 PER CANDIDATE
			SUPPORT	OPPOSE		
10/19/2016	Safe, Clean Neighborhood Parks And Open Space for All Los Angeles Reference No: CA 90017	Los Angeles County A	X		7500.00	7500.00
10/19/2016	Yes On The Los Angeles County Traffic Improvement Plan Los Angeles Reference No: CA 90017	Los Angeles County M	X		35000.00	35000.00
10/21/2016	Saves Lives California, A Coalition of Doctors, Dentists, Health Plans, Labor, And Sacramento Reference No: CA 95814	Non-Profit Health Advocate Organizations Statewide 56	X		10000.00	10000.00
Summary					SUBTOTAL	\$ 155000.00

Summary

- Amount Received - Payments of \$100 or More (include all Schedule A subtotals) \$ _____
- Amount Received - Payments of Less than \$100 (Not itemized) \$ _____
- Total Payments Received (Line 1 + Line 2) Enter here and in Column A, Line 1, of the Summary of Payments section on Page 1 \$ _____

**Schedule B
Payments Made**

SCHEDULE B

**CALIFORNIA
1992 FORM 401**

Statement covers period
from 09/25/2016
through 10/22/2016

5/6
I.D. NUMBER
1271833

SEE INSTRUCTIONS ON REVERSE
NAME OF SLATE MAILER ORGANIZATION:
CITIZENS FOR WATERS

NAME AND STREET ADDRESS OF PAYEE	DESCRIPTION OF PAYMENT	AMOUNT PAID
Gould & Orellana, LLC Long Beach Reference No: CA 90802	Political Reporting Services	2500.00

Summary

1. Payments of \$100 or More (Include all Schedule B subtotals)	\$ 2500.00
2. Payments under \$100 This Period (Not itemized)	\$ 0.00
3. Total Payments This Period (Line 1 + Line 2). Enter here and in Column A, Line 2, of the Summary of Payments section on Page 1.	\$ 2500.00
SUBTOTAL	\$ 2500.00

Schedule C Persons Receiving \$1,000 Or More

SCHEDULE C

Statement covers period from <u>09/25/2016</u> through <u>10/22/2016</u>	CALIFORNIA 1992 FORM 401 6/6
I.D. NUMBER 1271833	

SEE INSTRUCTIONS ON REVERSE
 NAME OF STATE MAILER ORGANIZATION:
 CITIZENS FOR WATERS

You must identify each individual listed on your Statement of Organization (Form 400) who received, directly or indirectly, \$1,000 or more from the organization during the period. (See Instructions on reverse regarding "indirect" payments.)

NAMES OF INDIVIDUALS RECEIVING \$1,000 OR MORE	AMOUNT THIS PERIOD	CUMULATIVE SINCE JANUARY 1
Gould & Orellana, LLC	2500.00	2500.00